



**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
AT PITTSBURGH**

KEVIN M. CLAY  
and  
CRYSANNE CLAY,

Plaintiffs,

v.

BANK OF AMERICA, NATIONAL  
ASSOCIATION; EQUIFAX INFORMATION  
SERVICES LLC; EXPERIAN INFORMATION  
SOLUTIONS, INC.; and TRANS UNION LLC,

Defendants.

Case No. 2:10-cv-00986-ARH

**MOTION FOR ADMISSION OF *PRO HAC VICE* TO THE BAR OF THE UNITED  
STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Movant, Equifax Information Services LLC, by and through its attorney, Rex F. Brien, Esquire, hereby moves this Honorable Court for the admission of Keasha Ann Broussard, Esquire to the Bar of the United States District Court for the Western District of Pennsylvania, *pro hac vice*, to represent movant, Equifax Information Services LLC, in the above captioned action and in support thereof avers as follows:

1. Keasha Ann Broussard, Esquire is a member of the law firm of King & Spalding LLP and represents movant, Equifax Information Services LLC in the above captioned action.
2. Keasha Ann Broussard, Esquire is a member in good standing of the Bar of the Georgia. A true and correct copy of the affidavit of Keasha Ann Broussard, Esquire, averring as such is attached hereto, made part hereof and marked as Exhibit "B".

3. Keasha Ann Broussard, Esquire, a member in good standing of the Bar of the United States District Court for the Northern District of Georgia.

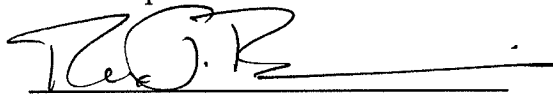
4. Keasha Ann Broussard, Esquire, is a member in good standing of the Bar of the 4<sup>th</sup> Circuit Court of Appeals.

5. Keasha Ann Broussard, Esquire, possesses satisfactory moral and professional character required for admission, *pro hac vice*, to the Bar of the United States District Court for the Western District of Pennsylvania. A true and correct copy of the affidavit of Rex F. Brien, Esquire, a member of the bar of the United States District Court for the Western District of Pennsylvania, averring as such and moving for admission of Keasha Ann Broussard, Esquire *pro hac vice*, is attached hereto, made part herein and marked as Exhibit "B".

6. Keasha Ann Broussard, Esquire, ECF Registration application has been approved.

WHEREFORE, movant, by and through its attorney, Rex F. Brien, Esquire, hereby moves this Honorable Court for the admission of Keasha Ann Broussard, Esquire, to the Bar of the United States District Court for the Western District of Pennsylvania, *pro hac vice*, to represent, Equifax Information Services LLC, in the above captioned action.

BY:



Rex F. Brien, Esquire  
Christie, Pabarue, Mortensen and Young  
A Professional Corporation  
1880 JFK Boulevard, 10<sup>th</sup> Floor  
Philadelphia, Pennsylvania 19103  
Direct Dial: 215-587-1609  
Direct Fax: 215-587-1699  
E-Mail: [RFBrien@CPMY.com](mailto:RFBrien@CPMY.com)  
Attorney for Movant, Equifax Information Services, LLC

Dated: September 10, 2010

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA  
AT PITTSBURGH**

KEVIN M. CLAY  
and  
CRYSANNE CLAY,

Plaintiffs,

v.

BANK OF AMERICA, NATIONAL  
ASSOCIATION; EQUIFAX INFORMATION  
SERVICES LLC; EXPERIAN INFORMATION  
SOLUTIONS, INC.; and TRANS UNION LLC,

Defendants.

Case No. 2:10-cv-00986-ARH

**AFFIDAVIT**

Rex F. Brien being duly sworn according to law, deposes and says that:

1. I am a member and partner of the law firm of Christie, Pabarue, Mortensen and Young, located at 1880 JFK Boulevard, 10<sup>th</sup> Floor, Philadelphia, Pennsylvania 19103.
2. I am a member in good standing of the Bar of the Supreme Court of Pennsylvania and have been since 1981.
3. I am a member in good standing of the Bar of the United States District Court for the Western District of Pennsylvania and have been since 1983.
4. I certify that Keasha Ann Broussard, Esquire possesses satisfactory moral and professional character required for admission to the Bar of the United States District Court for the Western District of Pennsylvania, *pro hac vice*.
5. I hereby move for the admission of Keasha Ann Broussard, Esquire to the Bar of the United States District Court for the Western District of Pennsylvania, *pro hac vice*, for

purposes limited to the representation of movant, Equifax Information Services LLC, improperly  
named in complaint in the above captioned action.

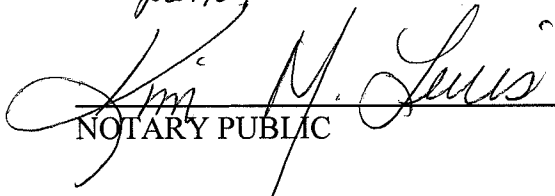
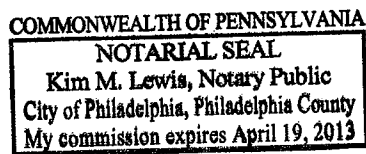
BY:



Rex F. Brien, Esquire  
Attorney for Movant, Equifax Information  
Services, LLC

DATED: 9/10/2010

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 10<sup>th</sup> DAY  
OF September, 2010

  
NOTARY PUBLIC



5. I am also a member of the Bar of the United States District Court for the Middle District of Alabama.

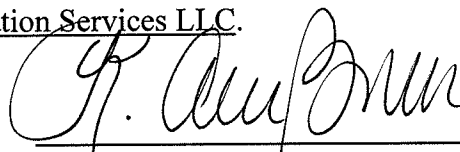
6. I am also a member of the Bar of the United States District Court for the Southern District of Alabama.

7. I am also a member of the Bar of the United States Court of Appeals for the 4<sup>th</sup> Circuit and continue to be a member in good standing.

8. I certify that the ECF registration has been approved by the court.

9. I certify that I have reviewed the local court rules and agrees to be bound by same.

I make this affidavit knowing that the Court will rely upon same with respect to a *pro hac vice* application on my behalf in order that I may, together with Christie, Pabarue, Mortensen and Young, represent the interests of Equifax Information Services LLC.

  
Keasha Ann Broussard, Esquire

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 9<sup>th</sup> DAY  
OF September, 2010

\_\_\_\_\_  
Notary Public



**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing **MOTION FOR ADMISSION *PRO HAC VICE* TO THE BAR OF THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA**, has been served upon the following on this the 10<sup>th</sup> day of September, 2010:

James M. Pietz  
Pietz Law Office LLC  
Mitchell Building  
304 Ross Street, Suite 700  
[jpietz@jpietzlaw.com](mailto:jpietz@jpietzlaw.com)

Leonard A. Bennett  
Consumer Litigation Associates  
12515 Warwick Boulevard  
Newport news, VA 23606  
[lenbennett@clalegal.com](mailto:lenbennett@clalegal.com)

Jennifer G. Betts  
Jones Day  
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Christopher N. Jones  
Kogan, Trichon & Wertheimer, P.C.  
1818 Market Street, 30<sup>th</sup> Floor  
Philadelphia, PA 19151  
[cjones@mstkw.com](mailto:cjones@mstkw.com)

A handwritten signature in black ink, appearing to read 'Rex F. Brien', is written over a horizontal line.

Rex F. Brien